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COUNSELORS AT LAW

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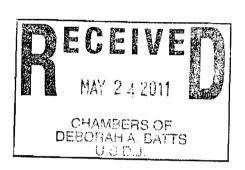
Andrew M. Zeitlin Phone: (203) 324-8111 Fax: (203) 324-8199 azeitlin@goodwin.com

MEMO ENDOAGED

May 23, 2011

## VIA OVERNIGHT MAIL

Hon. Deborah A. Batts United States District Court United States Courthouse 500 Pearl Street. Room 2510 New York, NY 10007



Re: ROK Entertainment Group, Inc. v. Alexander

Docket No: 1:11-cv-02728-DAB

Dear Judge Batts:

Our firm represents defendant Laurence Alexander in connection with the above-referenced matter. On behalf of Mr. Alexander, and pursuant to Your Honor's Individual Practices, this letter constitutes a request for a forty-five day extension of time -- to and including July 8, 2011 -- for Mr. Alexander to answer, move or otherwise respond to the plaintiff's Complaint, dated April 19, 2011. This letter is the defendant's first request for an extension of time. Service of the Summons and Complaint was purportedly made by the plaintiff, in the United Kingdom, on May 3, 2011. Accordingly, defendant's response to the Complaint would otherwise be due on May 24, 2011. I have spoken with Roger Fidler, Esq., counsel for plaintiff, who consents to the requested extension of time.

Good cause exists for the requested extension. Our firm has only recently been engaged to represent Mr. Alexander in this matter, and the extension of time is necessary to conduct the factual and legal investigation necessary to respond appropriately to the Complaint. This request is being made within the time in which the defendant's response to the Complaint is currently due.

MEMO ENDORSED

GRANTED. 15/ DAB 5/24/11

MEMO ENDOASED

Hon. Deborah A. Batts May 23, 2011 Page 2

Thank you very much for Your Honor's consideration of the request.

Very respectfully yours,

Andrew M. Zeitlin

AMZ:cnt

cc: Roger L. Fidler, Esq. (via PDF)

DEBORAH A. BATTS UNITED STATES DISTRICT JUDGE

MEMO ENDORSED